

From: [Tony Anderson](#)
To: [Steinhauer, Suzanne \(COMM\)](#); [DeBleeckere, Tricia \(PUC\)](#)
Subject: Clarifying comment IP-6941/GS-14-1052
Date: Monday, May 04, 2015 9:24:16 PM

I spoke at the Monday, April 27, 2015 environmental assessment scoping meeting regarding the solar project PUC docket number IP-6941/GS-14-1052. I want to make sure my points are clearly understood.

I have my doubts as the success of this project (and do not agree with the location nor the use of prime farm land for it) but I expect that it will be approved, so I have two points that I want addressed by the PUC:

1. **ESCROW ACCOUNT** The project life is 25 years and if that is not attained for whatever reason (or the project is abandoned), the cost to rehabilitate the site back to its original condition before the project was constructed {productive farm land} – all electricity providers/utilities involved (Marshall Solar, LLC; Nextera Energy Resources, LLC; other energy affiliates, etc.) should be required to invest cash in an independently controlled escrow account in an amount to pay 100% of the projected rehabilitation costs approved by the PUC plus another 25% for possible errors or unexpected costs.
2. **MINIMUM ANNUAL PRODUCTION TAX PAYMENT** The Marshall Solar, LLC's estimate of \$140,000 annual production tax to be allocated between the County and Township should be set as the minimum amount to be paid. The representative expressed confidence in their estimate for presentation purposes so I can only expect them to back that estimate with a dollar commitment. I truly believe their plans do not adequately address the loss of productivity during the winter snow season and their inability to remove the drifts from the panel acres.

Thank you,

Anthony R. Anderson (Tony)
3225 – 290th Street
Marshall, MN 56258

From: apache@web.lmic.state.mn.us
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Galbraith Wed Apr 22 16:28:24 2015 IP-6941/GS-14-1052
Date: Wednesday, April 22, 2015 4:28:29 PM

This public comment has been sent via the form at: mn.gov/commerce/energyfacilities/publicComments.html

You are receiving it because you are listed as the contact for this project.

Project Name: Marshall Solar Energy Project

Docket number: IP-6941/GS-14-1052

User Name: Mike Galbraith

County:

City: Marshall

Email:

Phone:

Impact: This project, if built on the proposed site, would be in violation of Minnesota Rule 7850.4400, which expressly and sensibly limits the construction of power generating facilities on land best suited for farming (growing food). This project should be built on land that is less fertile and better suited for alternative uses such as solar energy.

According to the UN, food production is going to have to double by 2050 to meet global demand. Our state would be acting imprudently by choosing to allow this solar facility to be constructed on prime farmland. Also in doing so, the state would needlessly waste acres of a precious resource that could have otherwise been used to help meet the global food demand.

Mitigation: There are many areas in our great state that are not classified as prime farmland. Building this facility on ground less suitable for farming would be a prudent decision and a better use of land.

Submission date: Wed Apr 22 16:28:24 2015

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick
andrew.koebrick@state.mn.us

Comments and questions in regards to Marshall Solar L.L.C. solar energy project
4/28/15

Our family is residence B in the solar application put forth by NextEra. There are 9 residences within ½ mile of the proposed project. In regards to the topics open for discussion for this environmental assessment we would like to offer the following by category:

Please keep in mind all questions and concerns pertain to this particular site of 500 continuous acres – 62.25 MW solar facility. All studies, scopes and processes are requested to be in consideration of the size and scale of this project, otherwise it is truly not relevant.

Potential human and environmental impacts:

We would like current studies that have been done regarding the safety of living near solar plants. Also, we are looking for studies about the impact of solar near high voltage power lines, as well. These studies need to be more specific that are addressed in the application section 4.

- EMF transmissions dangers to humans- what are they? EMF solar transmission in conjunction with the high voltage power lines(CapX 2020 lines)?
- Explanation of GS units and electrical frequency & safe levels for humans. Will the company install electrical microsurge meters on home owner's property? What protections are in place to assure there are no transmissions?
- Explanation of dirty electricity and how it pertains to solar energy plants.
- Dangers from the many inverters in close vicinity to many residences, studies that have been done?
- Explanation of all types of pollutants on site. Maintenance and disposal procedures.
- Fire risk and what happens if there would be a fire? What toxins would be released from the plant?
- Glare is stated to minimal in application pg. 36. Studies that have been done on this size of facility?
- Noise impacts from this size of a plant. Studies that have been done? Noise carries further in a quiet rural setting. Do inverters produce continuous noise?
- Water risks and issues? How are residents assured ground water and wells are protected? Is the company willing to test water periodically? What protections are being done? What happens if well water is found to be contaminated?
- Contamination of an aquifer? How would this be handled? Need studies showing how water is not affected.
- What studies have been done as far as wind & at what point will the panels not sustain strong wind?
- What procedures will be followed if an illness or cancer is linked to this project?

- Environmental impacts to the land. What research has been done about the loss of Prime Farm land? At what rate is the state losing land? What studies have been done about the idea that letting farm land "rest" is good for the land? In fact, according to the Environmental Impacts of Solar Energy Technologies (Elsevier.com) A PV system placed on once- cultivatable land will quite possibly damnify the soil from any further production.
- An Agricultural Impact Plan is suggested in the application. Has this been done?
- Studies of water run off issues & patterns from the size of this project? What measures are in place to protect the farmers next to this project?
- Statements in application on pages 48, 50 & 64 about the lack of knowledge of drainage and tile systems not acceptable. Statements about tile damages that can occur when underground electrical systems are placed & impacts to the tile. Damages can be insurmountable for farmers nearby the project. Assurances need to be in place. What type of further research has been done? Tile damage could easily impact upwards of 1000's of acres.
- Soil erosion concerns. Page 63 of application – stated that erosion would be reduced due to planting of native grasses under the panels. Would like to see photos and studies of the growth of grasses under panels in area such as this one. What happens if erosion is occurring? Damages to farms next to the project – how are damages handled?
- What studies have been done about weather patterns in regards to this solar site?
- Explanation & photos needed on 30-50 ft. collector line poles & gen – tie structures?
- How is decommissioning handled? What happens if the project fails to produce efficiently and fails?

In regards to alternative sites - we feel there are many other sites that can and should be considered. There are many acres in the state that are lower quality land that could easily be used. Geronimo energy, for instance stated they will develop marginal and abandoned industrial property near the Twin Cities (where this power is heading) rather than build one massive solar plant. We find it is interesting that on page 52 of the application, NextEra states that near the metro area; land would be generally more expensive and more densely populated areas may not be appropriate for these plants. But rather they choose to ask that the Minnesota rule 7850.4400 protecting Prime Farmland from over development basically be ignored. They fail to show there is no feasible or prudent sites in the state although there were over 110 RFP's filed for solar plants. We feel this burden needs to be placed on NextEra to research alternatives and with over 110 proposals available that would be a good place to start. Taking the easy way out – does not make this the right thing to do.

In addition, we would like to know the exact processes that will be in place going forward and how the scope of the assessment will be handled. How will this be communicated? Who is the lead contact we should ask to talk to?

On December 20th, 2014, our lives changed when we were told about 500 acres of our neighbors land to be sold for an industrial sized solar plant. As a 4th generation farmer, we cherish the land we farm. It is our own personal natural resource that we care for and tend. It is the gift we plan to pass on to our children. In fact, a petition to Save our Farms was started and within a short period of time, over 500 people from across the area and beyond have signed it. Going green is all of our responsibility; we are not at all against renewable energy. But solar energy, unfortunately requires square footage. It needs to cover a mass amount of area to produce energy. There are acres in the state that make way more sense to place these plants that are not as disruptive to a way of life and quite possibly someone's health. The technology has not been proven that there will not be any health affects although companies want us to believe otherwise; it is simply too new. Because of all the questions and alternate sites that can be considered, we ask the Public Utility Commission to deny the permit filed from NextEra.

Thank you for your consideration -
John and Janelle Geurts
Marshall, MN



ENERGY ENVIRONMENTAL
REVIEW AND ANALYSIS
ENVIRONMENTAL REVIEW
SCOPING COMMENT FORM

MARSHALL SOLAR PROJECT

Name: Don Ginder
Address: 3354 310th StR
City: Marshall State: MN ZIP: 56258

Please share your comments and suggestions on the potential impacts, mitigations, site modifications and alternative sites that should be considered in preparing the Environmental Assessment for the proposed North Star Solar Project.

You may turn in this form at the meeting, mail it to the address provided (use additional sheets as necessary), email comments to the Environmental Review Manager at suzanne.steinbauer@state.mn.us, comment at <http://mn.gov/commerce/energyfacilities/#comment> or fax comments to (651) 539-0109. Always use GS-14-1052 in the subject line. The comment period closes, Friday, May 15, 2015.

1. Is this going to raise the property value of the ag land and the ~~average~~ rural residents property for the purpose of property taxes?
2. Is there going to be another 4 or 5 hundred acres added in 2-5, 10 yrs to this site?
3. Is this project paying ^{property} taxes the same as if this was located at a industrial site located in a city. Ex Schwans property taxes lower vs this project location

Signature: Don Ginder Date: 4-27-15

PETITIONS

START A PETITION

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Save our Farms

author: [Save Our Farms](#)

target: Governor Dayton and the Public Commission

signatures: 504

504

1,000

we've got 504 signatures, help us get to 1,000

Nextera Energy Resources is proposing to build a 62.25 megawatt photovoltaic facility, located six miles northeast of Marshall. Near intersections 290th and County Road 9.

Approximately 500 acres of some of the best farmland in the state will be replaced with solar panels that have a life expectancy of 25 years. Once those 25 years have gone by the project will most likely be decommissioned.

Ten family farms will live within one mile of the land, where rich and abundant crops grown for decades will be replaced by an inefficient and out of place energy source. We are concerned of the possible health risks being forced upon these families, the value of their properties depleting, the disruption of natural habitat and the loss of county control

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you may think this is minnesota's way of going green but it is actually taking away the most important green our state currently grows - Save our farms!

* you cannot use an email more than once. The email is what validates each individual signing the petition.

you have the power to create change.

START SHARING AND WATCH YOUR IMPACT GROW

397 2

WE SIGNED: SAVE OUR FARMS

Dale Louwagie, MN

Mar 09, 20:44

504

Sign Petition!

50

First Name Last Name

don't display my name

Email

United States

Street Address City

State Zip

(optional)

For more impact, add a personal comment here

sign now

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19 pages
Submitted by:
Stanley Township
Citizens
Marshall MN,
Janette Courts

PETITIONS

START A PETITION

BROWSE

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login / join



Save our Farms

author: [Save Our Farms](#)

target: Governor Dayton and the Public Commission

signatures: 504

504

1,000

we've got **504 signatures**, help us get to 1,000

Sign Petition!

50

First Name Last Name

don't display my name

Email

United States

Street Address City

State Zip

(optional) For more impact, add a personal comment here

sign now

share my signature on Facebook

By signing, you accept Care2's [Terms of Service](#)
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We the undersigned refuse to support the Marshall Solar Energy Project that would take farmland out of production and threaten the health of nearby residents.

We stand as concerned citizens against the currently proposed location. We ask that alternative sights be considered that are less impactful to surrounding residents and productive farmland.

you have the power to create change.

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397

2

more

WE SIGNED: SAVE OUR FARMS

Dale Louwagie, MN	Mar 09, 20:44	# 504
Jim Carter, MN	Mar 06, 16:39	# 503
Deb Louwagie, MN	Mar 06, 15:36	# 502
Jacob Louwagie, MN	Mar 06, 15:34	# 501
Ryan Palmer, MN	Mar 06, 14:48	# 500
Rebecca Studniski, MN	Mar 06, 14:31	# 499

Governor Dayton and the Public Commission

We the undersigned refuse to support the Marshall Solar Energy Project that would take farmland out of production and threaten the health of nearby residents.

We stand as concerned citizens against the currently proposed location. We ask that alternative sights be considered that are less impactful to surrounding residents and productive farmland.

	Name	From	Comments
1.	Hugh Smith	Barnsley, United Kingdom	
2.	Katie Galbraith	MARSHALL, MN	
3.	John Brewer	MARIETTA, OH	
4.	Janelle Geurts	Marshall, MN	
5.	Chelsey Nelson	SLAYTON, MN	
6.	Erin Higgins	OSSEO, MN	
7.	Gretchen Major	chicago, IL	
8.	Amanda Mesman	Sioux Falls, SD	
9.	Breanne boness	Bloomington, MN	
10.	Mark Stewart	Aberdeen, United Kingdom	
11.	sarah higgins	maple grovs, MN	
12.	Katie Sorum	Maple Grove, MN	
13.	AMY VON HOLTUM	BRANDON, SD	
14.	Tessa Johnson	GRANITE FALLS, MN	
15.	gina meulebroeck	marshall, MN	
16.	Peggy Garberich	belgrade, MN	
17.	Amy Wymer	Marshall, MN	
18.	Pam Galbraith	MINNEAPOLIS, MN	
19.	Charissa Wall	Bemidji, MN	
20.	Greg Wymer	Marshall, MN	

	Name	From	Comments
21.	Tamar Knochenmus	LYND, MN	SAVE OUR FARMS! If you want to waste valuable land do it somewhere where people's health won't be put at risk!!!
22.	Barbara Anderson	COTTONWOOD, MN	Not cool. I'm all for alternate resources but not at the cost of farmland. There are many areas in the state that the land is only good for pastures (i.e. rocky) like the buffalo ridge where the windmills are. Do not ruin farmland & these farmers lives!
23.	Tracy Oeltjenbruns	Sioux City, IA	
24.	Amber Jans	Marshall, MN	
25.	Cheryl Evans	Lynd, MN	
26.	Mike Galbraith	Marshall, MN	
27.	Aaron Ahlquist	Chandler, MN	
28.	Lynnae Whitfield	Haw River, NC	
29.	Frances Buesing	boerne, TX	
30.	Kristy Brusven	COTTONWOOD, MN	
31.	Kayla Kuyper	Cottonwood, MN	
32.	Shelby Sorum	Fargo, ND	
33.	David Loe	HANLEY FALLS, MN	
34.	Kayla Fromm	GRANITE FALLS, MN	
35.	Alex Dean	FORT CAMPBELL, KY	
36.	Greta Hilmarsdottir-Ericson	North Liberty, IA	
37.	Brandi Louwagie	COTTONWOOD, MN	
38.	Jeremy brusven	COTTONWOOD, MN	
39.	Shawna Holt	Marshall, MN	
40.	Sheri Sternke	MARSHALL, MN	
41.	Audra Ross	MARSHALL, MN	
42.	Sandra wyffels	MARSHALL, MN	
43.	Kim Sanow	TRACY, MN	
44.	Denise Odegaard	LYND, MN	
45.	Trisha Rykhus	MARSHALL, MN	
46.	Tricia Jensen	Cottonwood, MN	
47.	Sarah Schrunk	Lynd, MN	
48.	Alison Winkelman	Marshall, MN	
49.	Lauren Geurts	Winona, MN	
50.	Kelly Deutz	MARSHALL, MN	

	Name	From	Comments
51.	Michelle sanderson	Balaton, MN	
52.	Allison Boerboom	Cottonwoos, MN	
53.	Ashley Frank	Wood Lake, MN	
54.	Mary c	Toronto, Canada	Please watch on YouTube Cause and Effect by blissful yogi
55.	Faith Van Norman	Delavan, MN	
56.	Alexandra Pogatchnik	Marshall, MN	
57.	Mary St. Aubin	Minnetonka, MN	I'm all for alternate forms of energy, but not at the cost of valuable farm land, potential health hazards and more importantly the loss of a life style. This life style is a chosen one, farmers farm for a reason, their love of the land and the fact that they feed the world.
58.	alesa paris	minnetonka, MN	
59.	Brady mellenthin	marshall, MN	
60.	Tamara Buesing	Slayton, MN	
61.	Patricia Groff	Cottonwood, MN	
62.	Erica Miller	Saint Cloud, MN	
63.	Connie Kockelman	MINNEOTA, MN	
64.	Leonard Louwagie	Marshall, MN	
65.	Annelise murphy	minneapolis, MN	
66.	Jessica Laleman	Marshall, MN	
67.	Jennifer Schmeichel	MINNEAPOLIS, MN	
68.	Cathy Hively	1641 180th Ave., MN	
69.	Emily Dorschner	MARSHALL, MN	
70.	Adam Deutz	fargo, ND	
71.	Jordan Deutz	MarshAll, MN	
72.	Renee Schnurstein	WORTHINGTON, MN	
73.	Hunter Kontz	Omaha, NE	
74.	Bonita Oestreich	PARKERS PRAIRIE, MN	
75.	P. Smith	SEATTLE, WA	
76.	Mandy Mellenthin	Lynd, MN	
77.	Justin hively	balaton, MN	
78.	Curt Boerboom	Marshall, MN	

	Name	From	Comments
79.	Ellie Falde	MARSHALL, MN	
80.	Emmy Luepke	WOOD LAKE, MN	
81.	Denise Mccarthy	Hastings, MN	
82.	Melanie Smisek	Marshall, MN	
83.	Theresa Meyer	Lakeville, MN	
84.	Keri Cole	Marshall, MN	
85.	Mike Mulder	MARSHALL, MN	
86.	Rose draper	Mrsrhall, MN	
87.	Leslie Hart	marshall, MN	
88.	Michelle Meulebroeck	MARSHALL, MN	
89.	Vicki DeBaere	MARSHALL, MN	
90.	Trisha Kienitz	Maynard, MN	
91.	Tim Moline	MARSHALL, MN	
92.	Nancy Orsmond	Highlands ranch, CO	
93.	Julie Manthey	MINNEAPOLIS, MN	
94.	Charlie Hurd	MANKATO, MN	This is so stupid. Put them on buildings!
95.	Natasha Drackley	MARSHALL, MN	
96.	Lance Dorschner	MARSHALL, MN	
97.	Kristen Maeyaert	MARSHALL, MN	
98.	Juli neuman	marshall, MN	
99.	Juli Sanders	MARSHALL, MN	
100.	Stephanie Condon	Minneota, MN	
101.	William Hunt	Ghent, MN	
102.	John Geurts	marshall, MN	
103.	Neil nath	MARSHALL, MN	
104.	Bruce Maeyaert	MARSHALL, MN	
105.	James Wyffels	WASECA, MN	
106.	Gary Weeks	Pipestone, MN	
107.	Corrine Fogelson	Marshall, MN	
108.	Bermard wing	Marshall, MN	
109.	Ron Weidauer	Marshall, MN	
110.	Kelsey Heppler	Moorhead, MN	
111.	Erin Geary	MARSHALL, MN	
112.	Lee Hebert	WATERVILLE, MN	Corporations do not own America, although it appears that government is allowing them to do so. Stop this petition NOW!

	Name	From	Comments
113.	Teri Hively	Balaton, MN	think of future generations and we need our farm land
114.	Ellie Salter	SIOUX FALLS, SD	
115.	Liz Hebert	WATERVILLE, MN	
116.	Val rushton	Savage, MN	
117.	Todd Boerboom	Marshall, MN	
118.	Justin Louwagie	COTTONWOOD, MN	
119.	Barb Mesman	SIOUX FALLS, SD	
120.	Halie Speiser	Marshall, MN	
121.	Shawn laleman	Marshall, MN	
122.	Deb Hesse	TRACY, MN	
123.	Jordan Boerboom	MARSHALL, MN	
124.	jason geurts	marshall, MN	
125.	Isaac Marks	Marshall, MN	
126.	Alyssa Edwards	Marshall, MN	Please do not use these solar panels. These are peoples farmland that we are talking about and the power isn't even going to us so whats the point! your hurting others
127.	Sophia Buysse	Marshall, MN	
128.	Laurie Hill Viaene	Marshall, MN	
129.	Kelsey Boerboom	Marshall, MN	
130.	dawn Mitlyng	Marshall, MN	
131.	Lisa Edwards	marshall, MN	
132.	Jordan boerboom	MARSHALL, MN	
133.	Claire Buysse	MARSHALL, MN	
134.	Erin mitlyng	OWATONNA, MN	
135.	Jane Bitker	cottonwood, MN	
136.	John Boerboom	MARSHALL, MN	
137.	Lee Louwagie	Marshall, MN	
138.	Shannon Schultz	Marshall, MN	
139.	Summer Alsaker	Lynd, MN	
140.	Samantha Geurts	MARSHALL, MN	
141.	Hillary Riecke	Clarkfield, MN	
142.	Greg Boerboom	MARSHALL, MN	Don't put the solar panels on prime farmland. Couldn't they be mounted on the windmill structures? The electrical components are already there,
143.	Shannon Eliason	sacred heart, MN	
144.	Elizabeth Swift	Russell, MN	
145.	Scott mellenthin	marshall, MN	
146.	Hannah Olson	Maple Grove, MN	

	Name	From	Comments
147.	Dana Boerboom	Cottonwood, MN	
148.	Heather Gniffke	Echo, MN	
149.	Linda Sanders	MARSHALL, MN	
150.	Ruthie Loe	Cottonwood, MN	
151.	Anne Haarhoff	George, South Africa	
152.	Hatice Guducu Baytekin	İzmir, Turkey	
153.	tom allex	marshall, MN	no panels in my backyard!!!!!!!!!!!!!!!
154.	Beverley Evans	Balaton, MN	
155.	Lynn Schultz	Marshall, MN	
156.	becky regnier	marshall, MN	
157.	james morton	marco island, FL	
158.	Jon Jeseritz	COTTONWOOD, MN	
159.	Kelsey Boerboom	Marshall, MN	
160.	Suzanna Hagglof	Kristianstad, Sweden	
161.	Dottie Simons	Phoenix, AZ	
162.	lenae osmondson	norfolk, VA	
163.	Maureen Carmody	IVANHOE, MN	
164.	Holly Cooper	P C BEACH, FL	
165.	Patricia Paradis	Lynd, MN	
166.	Richard Boerboom	SAINT PETERSBURG, FL	
167.	Russ Nelson	Huron, SD	
168.	Diane Doll	MARSHALL, MN	
169.	Cathy Lee	Marshall, MN	
170.	Nancy Pratt	MARSHALL, MN	
171.	Jennifer Hinz	Wood Lake, MN	Do not up this up on rich farm land, find locations that are less populated and land is poor for crops.
172.	Julie Allen	Marshall, MN	This is just wrong, to take great farmland and turn it into possible energy is a crime. We need our farmers.
173.	Tina Evans	DOWELLTOWN, TN	
174.	Tim Miller	St. Cloud, MN	
175.	Jan Bahlmann	Marshall, MN	
176.	Sharon Fenske	Marshall, MN	
177.	Valarie Kauffman	Sioux Falls, SD	
178.	Cory Janssen	MAYNARD, MN	
179.	Jason Weber	MARSHALL, MN	

	Name	From	Comments
180.	Darlene Jandl	Marshall, MN	Farmers are the guardians of the land.. I'm for alternative power, but not at the farmers loss. Put your panels elsewhere!!
181.	charles muller	marshall, MN	don't surround my home with panels
182.	Stacie Mulso	Marshall, MN	
183.	Elmer Green	Lynd, MN	
184.	Rachel Serreyn	Marshall, MN	
185.	Art Matthys	Marshall, MN	
186.	Denny Oeltjenbruns	Marshall, MN	
187.	Sean Boll	N. St. Paul, MN	
188.	Rolly Muller	Marshall, MN	
189.	Tricia Stelter	Marshall, MN	
190.	Sara Terra	GRANITE FALLS, MN	
191.	Melissa Broman	Marshall, MN	
192.	Shelly Versaevel	Marshall, MN	Not only will this be destructive to the local economy, but it is causing much hurt within the community. I believe there could be better locations found within the state. Please do more research regarding a new location
193.	Timothy Alex	Sioux Falls, SD	This solar farm is petitioned to go up 1/2 mile from my the homestead I grew up on that my father still owns. There are definitely hazards associated with these solar farms and because of the lack of longterm data available this is a huge safety concern for residents in close proximity not to mention this will make property values plummet in this area. These are extremely hard working people that have built their farms over a lifetime and this will destroy their values not to mention this is prime farmland. The placement makes no sense, why not place these in areas with lesser population and non tillable ground. I live in SD currently, there are millions of acres of nothing in Western SD, put these solar farms in areas like this where they will not impact anyone!
194.	Jesse Nelson	Minneota, MN	
195.	Marie Johnson	Worthington, MN	
196.	Roxanne Serreyn	Marshall, MN	
197.	Gary Erbes	MARSHALL, MN	
198.	Luci Kovash	Marshall, MN	
199.	Mark Pedersen	Marshall, MN	
200.	Charles Myrbach	Marshall, MN	
201.	David Bitker	LAKE ELMO, MN	

	Name	From	Comments
202.	wendy kvam	WHEATON, MN	
203.	Terry Stofferahn	MINNEAPOLIS, MN	I believe farming is the basis of the founding and continuation of this State and should not be sacrificed for expensive green energy.
204.	Ryan Serrey	Marshall, MN	
205.	Terry Bahlmann	Marshall, MN	
206.	Mistin Allex	Marshall, MN	
207.	Serdar Murat	Vienna, Austria	
208.	Cory Deutz	MARSHALL, MN	
209.	Julie Kent	Tyler, MN	
210.	Michael Allex	Marshall, MN	
211.	Ben Williamson	bloomington, MN	
212.	Craig Fischer	Marshall, MN	
213.	Sissy Klingler	MARION, IA	
214.	Kathy Cokus	YARDLEY, PA	
215.	Marilyn Groff	Marshall, MN	There is plenty of poor land around to put a project like this on instead of using prime farm land right next to building sites.
216.	Alexander Oey	Marshall, MN	
217.	Arlene Buysse	Minneota, MN	
218.	Shana allex	marshall, MN	
219.	Lyndsie Adams	SHAKOPEE, MN	
220.	gena atcher	marshall, MN	
221.	Mary Kvam	Marshall, MN	
222.	Edward Adams	SHAKOPEE, MN	
223.	Margaret Bump	MILTONA, MN	
224.	Ashley Sammons	Independence, MN	
225.	Sara Polfliet	Sioux Falls, SD	
226.	scott wernimont	cottonwood, MN	
227.	john trost	Marshall, MN	
228.	Addison Arzdorf	marshall, MN	
229.	Ted deutz	Marshall, MN	
230.	Lisa Stelter	HARTFORD, SD	
231.	Dan Polfliet	Marshall, MN	First off I want to state I am not against alternative energy, just feel there are better non productive land choices for this project. The world population estimates today are approximately 7 billion people with expected population of 9.3 billion by 2050. How do you expect to feed everyone if you continue to take productive farmland out of <i>(continues on next page)</i>

	Name	From	Comments
231.	Dan Polfliet	Marshall, MN	<i>(continued from previous page)</i> production? There are other alternatives for energy, we only have so much land for growing food.
232.	Rick Schoephoerster	MARSHALL, MN	THEY CAN FIND A BETTER SPOT, UNPRODUCTIVE LAND .
233.	william Larson Larson	Marshall, MN	
234.	Tanya Polfliet	Cottonwood, MN	
235.	Denise Allex	Sioux Falls, SD	
236.	Dan VanOverbeke	marshall, MN	
237.	Megan Anderson	Saint Paul park, MN	
238.	Alex johnson	Fargo, ND	
239.	Eric Honetschlager	Marshall, MN	
240.	Bill Blomme	MARSHALL, MN	
241.	Krista Meulebroeck	MARSHALL, MN	
242.	Kevin Ellingson	Marshall, MN	
243.	Rachel Ellingson	marshall, MN	
244.	troy deutz	Marshall, MN	Think about the other people.....
245.	Isac Evenson	Marshall, MN	
246.	Ben Muller	MARSHALL, MN	
247.	Gabrielle Skramstad	Sioux Falls, SD	
248.	Chelsey Polfliet	Mankato, MN	
249.	Savanna Tomoson	Marshall, MN	
250.	Adam Koepke	Granite Falls, MN	
251.	Dennis Hance	Sioux Falls, SD	
252.	Aaron Mathiowetz	Marshall, MN	
253.	Jeremy Vankeulen	St. John's, FL	
254.	nick duis	CANBY, MN	
255.	Ashley quesada	Lynd, MN	
256.	john deslauriers	canby, MN	
257.	jason gee	COTTONWOOD, MN	
258.	Spenser Christensen	MARSHALL, MN	
259.	Mike Holmberg	MARSHALL, MN	

	Name	From	Comments
260.	Eric Von Holtum	Norristown, PA	
261.	Matt St.Aubin	Winona, MN	
262.	Julie Geary	Marshall, MN	
263.	Ted Geary	MARSHALL, MN	
264.	Becky Polfliet	Marshall, MN	
265.	Alex Turbak	Brookings, SD	
266.	riley potter	faulkton, SD	
267.	Nathan Frericks	ASHTON, SD	
268.	Abigail Doom	Marshall, MN	
269.	Ryan Viaene	COTTONWOOD, MN	
270.	Tammy Ruppert	MOUND, MN	
271.	Alissa Doom	MARSHALL, MN	
272.	Brad evenson	Marshall, MN	
273.	Zane Petersen	Lakeville, MN	
274.	Dallas Mahoney	MARSHALL, MN	
275.	Jordan Wiesen	MARSHALL, MN	
276.	Michaela Thooft	Marshall, MN	
277.	Haley vankeulen	Fargo, ND	
278.	Tristen Groff	Cottonwood, MN	
279.	Paige Deutz	denver, CO	
280.	Mark Vandeputte	Marshall, MN	
281.	Gwen Vankeulen	St johns, FL	
282.	Cheryl claude	delavan, MN	
283.	Deb Nelson	EXCELSIOR, MN	why in valuable productive farm land? how can you maintain a system like this and not damage or affect the farmland adjacent to it? what about the families living around it. this has not been thought through at all Governor Dayton-why was the original location in Edina not selected? why not in Buffalo Ridge - You need more options - NOT MARSHALL
284.	Jared kriegler	KERKHOVEN, MN	
285.	Linda Louwagie	marshall, MN	
286.	Brett Petersen	MURDOCK, MN	
287.	Dawn Deutz	Marshall, MN	Non- productive land is a better choice. Why MN?
288.	Janet Trost	Marshall, MN	
289.	adam trost	marshall, MN	
290.	Rachelle Wigtil	Fargo, ND	
291.	Kathy Derynck	Minnetonka, MN	
292.	Bryce Gorder	Canby, MN	

	Name	From	Comments
293.	christian full	watertown, SD	
294.	Alex Mathiowetz	Marshall, MN	
295.	Nick Evans	lynd, MN	
296.	Ben frieler	Burtrum, MN	
297.	Jim Hivly	Balaton, MN	
298.	paula Gee	CXottonwood,Mn, MN	
299.	Brody Lindquist	KERKHOVEN, MN	
300.	mackenzi zwaan	LUVERNE, MN	
301.	Johnathan Tubbs	WINONA, MN	
302.	Debra Warnke	Marshall, MN	
303.	Arlyn Lindsay	Marshall, MN	If you are going to waste our money, do it on waste land
304.	Lucas Voorhees	Cottonwood, MN	
305.	Jenessa Blomme	Marshall, MN	
306.	Kim Banks	Lynd, MN	
307.	Helen Peterson	cottonwood, MN	
308.	Richard Stelter	HARTFORD, SD	
309.	Kirsty Mayfield	Nottingham, United Kingdom	
310.	brad bakker	RENVILLE, MN	
311.	Andrew Bentz	Eureka, SD	
312.	Elizabeth Fixen	Marshall, MN	
313.	joseph kasper	moorhead, MN	
314.	Bob deutz	MARSHALL, MN	
315.	Mason Schnaible	Marshall, MN	
316.	Albee James	Marshall, MN	LOOK FOR A PLACE WITH MORE SUNNY DAYS AND LONGER DAYS.... Or, put them on those hill sides near the wind towers near the buffalo ridge. Get and use some common sense for a change.
317.	Randy Serreyn	Matshall, MN	
318.	Joel Higgins	OSSEO, MN	
319.	Erin Higgins	ELK RIVER, MN	
320.	Erin Higgins	OSSEO, MN	
321.	Bradley Rosa	COTTONWOOD, MN	
322.	mike dale	lynd, MN	why surround several building sites with solar panels. these people live in the country to see the scenery that they are looking at now, if they would want a city like scenery they would live in town. I would feel like I live in new York city being surrounded by the panels.
323.	matt wilson	marshall, MN	

	Name	From	Comments
324.	jake sharkey	hanley falls, MN	
325.	Joyce Caugherty	HENDRICKS, MN	
326.	Jeanne Alex	MARSHALL, MN	
327.	Paula Schooley	Mayer, MN	
328.	Emily Oeltjenbruns	West des Moines, IA	
329.	Ruth Louwagie	Marshall, MN	We need this fertile land to produce crops not for solar panels.
330.	Mike Klein	Marshall, MN	
331.	sharon jacobsen	tyler, MN	
332.	Donna Weidauer	Marshall, MN	
333.	Rebecca Sammons	MARSHALL, MN	
334.	Zachary VanOverbeke	Madison, WI	This is a great idea. I am all for renewable energy, but we need to put it where it's not going to uproot lives.
335.	Marianne and Bernie Boerboom	Walnut Grove, MN	
336.	Theresa Welu	Kilroy, MN	
337.	Brent Thooft	russell, MN	
338.	Kolin Drietz	CANBY, MN	
339.	Spencer Van Overbeke	Marshall, MN	
340.	Sandy Frieler	burtrum, MN	
341.	nicholas baatz	PIPESTONE, MN	
342.	Alec Lange	MONTICELLO, MN	
343.	norm hinz	algona, IA	
344.	may may	singapore, Singapore	Please do not destroy farmland for science and development. We need food. This is far more important than that research photovoltaic facility ! Human population is increasing so fast and there is no way it is going down in the next decade or so. Decreasing farmland is a huge man made disaster and utterly with no common sense at all. Many people are in poverty and need basic needs to be met and food is one very very essential aspect if one is to survive at all. Stop this development of photovoltaic facility. We strongly oppose to it and no exploitation of farmlands!
345.	Erin Jensen	Marshall, MN	
346.	brian Potter	ponca, NE	
347.	Leia Schmidt	Cottonwood, MN	
348.	Jacalyn VanOverbeke	MARSHALL, MN	

	Name	From	Comments
349.	James Breczinski	Minnetonka, MN	The solar panels will shade the soil, nothing will grow, the soil will wash and blow away, ruining the cropland forever.
350.	Brent Huhnerkoch	Redwood Falls, MN	
351.	LeRoy Buys	Chandler, MN	I do not see why prime farm land has to be used when the Government already has a lot of wild life acres and there is un farmable land they could use.
352.	CJ Dahm	GOLD CANYON, AZ	
353.	Randy groff	Cottnwood, MN	
354.	Curtis Rykhus	MINNEAPOLIS, MN	
355.	Dan Webb	SAINT PAUL, MN	
356.	colin stelter	lynd, MN	
357.	Caterina Rech	Melbourne, Australia	
358.	Austin vandendriessche	marshall, MN	
359.	Hannah Enderson	Marshall, MN	
360.	Danica Vandendriessche	Marshall, MN	
361.	Amanda Kolander	Vesta, MN	
362.	Melissa Stassen	MARSHALL, MN	
363.	Megan Wellnitz	fond du lac, WI	
364.	Katie Bailey	SARTELL, MN	
365.	Hayden McKittrick	WABASSO, MN	
366.	Kayla Baune	Marshall, MN	
367.	Brandon Baldeschwiler	FOND DU LAC, WI	
368.	Marcia sik	Marshall, MN	
369.	Don Ginder	Marshall, MN	
370.	Amanda Varpness	garvin, MN	
371.	John Breczinski	Golden Valley, MN	
372.	Karen Bofferding	Marshall, MN	
373.	David schmeichel	MINNEAPOLIS, MN	
374.	Tom Bofferding	Marshall, MN	
375.	Roger Wartner	Marshall, MN	
376.	Jessica Tubbs	Otsego, MN	
377.	Laura Mitlyng	Moorhead, MN	
378.	Jon Boerboom	WALNUT GROVE, MN	

	Name	From	Comments
379.	Craig Lindsay	Marshall, MN	No!
380.	Kayla Vandendriessche	Marshall, MN	
381.	Danuta Watola	Kalety, Poland	
382.	Lauren Eland	EDEN PRAIRIE, MN	I grew up in Farmland Minnesota & the thought of getting rid of that is absurd.
383.	Dean Bruns	MARSHALL, MN	
384.	chris swedzinski	Ghent, MN	
385.	Eden Deutz	MARSHALL, MN	
386.	Ashley Deutz	Independence, MN	
387.	Matt Boerboom	Marshall, MN	
388.	Lorelei olson	BUFFALO, MN	
389.	DIANE COAD	Brush, CO	
390.	Jerry Fury	Marshall, MN	
391.	bruce garrels	balaton, MN	
392.	Sandy nath	MARSHALL, MN	
393.	Patty Swett	TUCSON, AZ	
394.	Beau Bofferding	Marshall, MN	
395.	Tom Vroman	MILROY, MN	
396.	Arlene Polejewski	Taunton, MN	
397.	Karen Goergen	Tracy, MN	
398.	Angela Kohn	Cologne, Germany	
399.	Amy Van Lith	BIG STONE CITY, SD	
400.	Kent Mesman	Sioux Falls, SD	
401.	Mickel Goepterich	COTTONWOOD, MN	
402.	Natasha Muller	Marshall, MN	
403.	Dawn Boerboom	Marshall, MN	
404.	Krista davis	echo, MN	
405.	JOSEPH PLAETZ	LUCAN, MN	
406.	JODY NIESEN	Alexandria, MN	
407.	Chad Niesen	Alexandria, MN	
408.	Paula Goblsh	MARSHALL, MN	
409.	Norma jean Carrow	SEBRING, FL	
410.	Madelyn Geurts	Marshall, MN	
411.	Brad Gruhot	MARSHALL, MN	
412.	Ben Nath	MARSHALL, MN	

	Name	From	Comments
413.	Christina Walker	MUSCATINE, IA	
414.	Rosemary Bock	MARSHALL, MN	I just watched a video about solar roadways! So much better than wasting farmland.
415.	James Leachd	Marshall, MN	
416.	Mike. Buesing	Marshall, MN	
417.	Scott Vandeputte	Victoria, MN	
418.	Sandy Buesing	Marshall, MN	
419.	Kenneh Versaevel	MARSHALL, MN	
420.	nate Petersen	MARSHALL, MN	
421.	Ronald Van keulen	Ghent, MN	
422.	Karen Versaevel	Marshall, MN	
423.	Daniel Louwagie	Cottonwood, MN	
424.	Andy Coudron	Marshall, MN	
425.	mark Matson	Marshall, MN	
426.	mary louwagie	marshall, MN	
427.	Joe Versaevel	Marshall, MN	
428.	Nick Versaevel	Marshall, MN	
429.	Jared Deutz	marshall, MN	
430.	Kelly deutz	MARSHALL, MN	
431.	Alice Deutz	MARSHALL, MN	
432.	Ruth Beesch	CUSTER, SD	
433.	Max Deutz	MARSHALL, MN	
434.	elizabeth Hankermeyer	Marshall, MN	
435.	Teri Boerboom	Chatfield, MN	
436.	Andrea Wing	Lynd, MN	
437.	Amy Dreessen	Yutan, NE	
438.	Jaime bofferding	TULSA, OK	
439.	Steve Schell	MARSHALL, MN	
440.	Cheryl Allex	Crystal, MN	
441.	Vanessa Morken	Fargo, ND	
442.	Kevin hart	marshall, MN	
443.	Randal Boerboom	Chatfield, MN	
444.	Susan McNeely	Inver Grove Heights, MN	
445.	Emily Buysse	Marshall, MN	
446.	Molly Tubbs	Marshall, MN	

	Name	From	Comments
447.	james Muhlenbeck	Wells, MN	
448.	Rachel Thomsen	ROYAL, IA	
449.	sandy enemark	tyler, MN	
450.	Carolyn Cassel	VERONA, WI	
451.	Brian Cassel	VERONA, WI	
452.	Laura Olson	Waseca, MN	I am strongly opposed to building this energy facility on the land near Marshall. To lose 500 acres of prime southwest Minnesota farmland is a waste of natural resources.
453.	Nancy Rose	Springfield, MO	
454.	Michelle Stassen	Marshall, MN	
455.	Karen VanKeulen	ghent, MN	
456.	Jane Mellenthin	Marshall, MN	This industrial-size project is just too enormous and ag-detrimental of a project for the community surrounding it. This does not serve "our community" locally at all. Those right next this have a history of preserving and cultivating this land for their lively-hood and homesteads...only to be devastated. There are set-back rules for everything... Why isn't there something that says a project of this magnitude can't be built or take away profitable agricultural land.
457.	Julie Arias	San Diego, CA	
458.	chad cole	Marshall, MN	
459.	Karli Vandeputte	Chaska, MN	
460.	Pat VanKeulen	Ghent, MN	
461.	Patrick Breczinski	Crystal, MN	The City of Marshall has several empty building spots that could be used. Imagine the outcry if this was going to be taking land from a city business.
462.	Melissa Younger	Morton, MN	
463.	Paul Younger	Morton, MN	
464.	Angie Boerboom	Walnut Grove, MN	
465.	Julie Miller	Marshall, MN	
466.	Janice Banks	CENTER BARNSTEAD, NH	
467.	Ken Mukomela	Marshall, MN	
468.	Rita Vandeputte	Marshall, MN	
469.	Sara Wiedmaier	marshall, MN	
470.	Ashley Jensen	Marshall, MN	
471.	Shane VanDamme	Russell, MN	
472.	Francis Mortier	Marsahll, MN	
473.	Ed Bauman	Russell, MN	

	Name	From	Comments
474.	Alyssa Vandeputte	Sioux Falls, SD	
475.	Donna Vandeputte	Marshall, MN	
476.	Miranda Fischer	Marshall, MN	
477.	Lisa Zylstra	Minneapolis, MN	
478.	Frank Moen	Minneapolis, MN	
479.	Dan Jandl	Duluth, MN	
480.	Linda Oftedahl	Ghent, MN	
481.	joan muenchow	Prior Lake, MN	
482.	Heather Murphy	Cottonwood, MN	
483.	Angie Andrews	marshall, MN	
484.	Jessica vanoverbeke	Marshall, MN	
485.	Michael Weverka	Marshall, MN	
486.	tim deutz	marshall, MN	
487.	Jaime Rekedal	marshall, MN	
488.	Greg Labat	marshall, MN	
489.	john lange	Marshall, MN	
490.	Angie Rohne	Coon Rapids, MN	
491.	Vanessa boudewyns	washington, DC	
492.	Doris cool	Marshall, MN	
493.	Amy Salfer	Marshall, MN	
494.	Janet Mildenberger	mesa, AZ	
495.	Ryan Boudewyns	Saint Paul, MN	
496.	KERMIT OLSON	Mcallen, TX	none
497.	Lori Fruin	Cottonwood, MN	
498.	jill person	marshall, MN	
499.	Rebecca Studniski	Marshall, MN	
500.	Ryan Palmer	Marshall, MN	
501.	Jacob Louwagie	Cottonwood, MN	
502.	Deb Louwagie	Cottonwood, MN	
503.	Jim Carter	Marshall, MN	
504.	Dale Louwagie	Cottonwood, MN	

Why put this on prime farmland?

What kind of alternative sites have you checked into?

Is there a different site that will not displace prime farmland?

Has there even been a solar farm of this size constructed in an area and environment as this one is to be placed on?

What kind of impact on our environment will this have?

1. Will there be light pollution from glare?
2. Will there be water contamination with all the run off of the panels?
3. What are the panels made of?
4. Will the inverters of this farm cause a nuisance noise?

Considering all the noise from the substation and all the high voltage overhead wires that we have now without adding more power to the existing things now.

Have you done any kind of studies for any of these things of this size and magnitude in this type of area?

If you have can we get copies of all the data?

What kind of health implications will this solar farm produce?

1. Are these panels cancer causing?
2. Will this cause birth defects in pregnant women?
3. Will it affect a child's growth and wellbeing having to grow up around dangerously high voltage power lines, substations and solar panels and inverters?
4. If there is no health issues, why are these being built in mountains, deserts and non-populated areas?

Are there safety issues with the panels?

1. What happens when lightning strikes an inverter?
2. What happens when a wind storm comes through and blows them down?
3. What happens when the snowdrifts bury them in a snowstorm?

Have you done any studies for any of these issues?

If you have done studies for them have they been done for the long term as 25 year stints as this is how long the projections for the solar panels are to last?

If there has been studies done are they conducted in the size and magnitude scale of this project?

Chuck Miller
2924 City RD 9
MARSHALL MN
56258
507-829-0660

Questions for Minnesota Department of Commerce

RE: Public Information and Environmental Assessment Scoping Meeting
In the Matter of Marshall Solar, LLC for a Site Permit for
Marshall Solar Energy Project
Monday, April 27 or Tuesday, April 28, 2015
Marshall Lyon County Library

Below are my questions/concerns regarding this project. I apologize for not being at the meeting, but I am out of town for my job. I believe any studies being done in regards to this solar farm project need to occur on a facility of the same size. You cannot compare a 50 acre farm and their effects and say it will be similar for a 500 acre farm. You need to study facilities of equal or comparable size.

- 1) Is the Department of Commerce going to investigate the implications of taking this prime farmland out of commission – and what global implications it may have?
 - a. Are you setting a precedent for future conversions of additional farmland to solar farms?
 - b. And if so, what implications will that have on our country's food supply in the future?
- 2) What is the scope of your analysis (water, land, contamination of well waters, etc.)? Will your study also include an analysis of the materials used (silicone, etc), as well as noise levels and sun glare, especially on solar farms of this size?
- 3) Have you found or done any studies on the health issues associated with solar farms of this size?
 - a. If not, how can you guarantee that there are no concerns? And how can you approve the project and have that risk out there?
 - b. If yes, was the study done on a solar farm of similar size?
 - c. If NextEra's facts are correct and there are no health issues, why are there not any large solar farms by people? From our research, it seems that solar farms of this size are located in deserts and mountains.
 - d. We purchased our rural home in 1995 to enjoy the peace and quiet of the country and to see the crops and wildlife. We already have a large substation 1/3 of a mile from our place and huge power lines, and this is now the view from the windows of our home. How much more can they put in one area? Most power generating systems are not by homes. There are studies showing that high voltage lines have been shown to cause increased cases of cancer. I cannot believe that a solar farm of this size would not also have some type of health implications.
- 4) Are you going to look at other alternative sites, and how these sites would affect the environment in comparison to this one? (You could begin by looking at the other 110 proposals that EXCEL had received with their RFP)
- 5) What is the exact process you are going to follow to approve or deny this request? Will we be kept involved in the process?

One last comment – please just remember that farmland IS a natural resource also!

Rosalie Muller
2924 County Road 9
Marshall, MN 56258
507-537-1774
rollymuller@hotmail.com





SOOPERFAX SERVICE

FAX TRANSMISSION COVER SHEET

DATE: 5-14-2015 TIME: 5:50 pm PAGE 1 OF 2

FROM: Min. Public Ut. Comm. John Nelson

PHONE # _____ FAX # 651 539 0109

COMMENTS: Please read attached comment

on PUC Docket # 14-1252

RE-ORDER ITEM #72108

May 14, 2015
Minnesota Dept. Of Commerce

Re: PUC Docket # 14-1052

Public Comment:

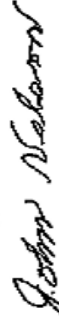
Since my sister, Alta Barber, Randolph, Mn. 55065, and I, John Nelson of Aurora, Co., 80013 own 240 acres of farm land in Lyon County, Mn., Stanley Township, Section 33, we will have the most linear feet of our lands boundaries effected on the North and East of this solar installation.

My only comment on this installation is our fear that this installation could result in affecting our lands value negatively.

I sincerely hope this will not become the case. I have done research on similar installations in other states. Many of them are in desert land areas with minimal impacts to productive farmland. There has been an installation in Minnehaha County, South Dakota, very near Sioux Falls, South Dakota. No information as to the effect upon farm land values there was given.

Thank You for letting me comment upon this upcoming installation that could negatively affect us.

Sincerely,



John Nelson
19679 E. Purdue Pl.
Aurora, Co. 80013
303 875 9313

4/29/15

Comment attachment regarding 14 – 1052 Marshall Solar L.L.C.

Please find that attached objection letter dated March 20, 2015 filed during the previous comment period on the completeness of the application of Marshall Solar.

We feel that this letter now applies to the comments at hand for this current EA assessment.

We ask that the issue of Minn Rule 7850.4400 be considered and reviewed during this process.

Thank you –

John and Janelle Geurts

Ron and Donna Weidauer

Chuck and Rosalie Muller

Tom and Jeanne Alex

Dan and Becky Polfliet

RECEIVED

MAY 04 2015

MAILROOM

The Law

Minn. Rule 7850.4400, a section entitled “PROHIBITED SITES,” provides in pertinent part:

Subp. 4. **Prime farmland exclusion.** *No large electrical power generating plant site may be permitted where the developed portion of the plant site, excluding water storage reservoirs and cooling ponds, includes more than 0.5 acres of prime farmland per megawatt of net generating capacity, or where makeup water storage reservoir or cooling pond facilities include more than 0.5 acres of prime farmland per megawatt of net generating capacity, unless there is no feasible and prudent alternative. Economic considerations alone do not justify the use of more prime farmland.* “Prime farmland” means those soils that meet the specifications of Code of Federal Regulations 1980, Title 7, Section 657.5, Paragraph (a). These provisions do not apply to areas located within home rule charter or statutory cities; areas located within two miles of home rule charter or statutory cities of the first, second, and third class; or areas designated for orderly annexation under Minn. Stat. § 414.0325.¹

Analysis

NextEra cannot show that “no feasible and prudent alternative” exists and, in fact, has neglected to address any alternatives in its Application.

NextEra Energy Resources, LLC is a large and sophisticated global entity with a market capitalization of \$50 billion and energy projects throughout the world. NextEra submitted the Application through Marshall Solar, LLC, a subsidiary of a subsidiary of NextEra. NextEra unquestionably has the sophistication and financial wherewithal to explore alternative sites for projects, although it opted not to do so here.

There is no dispute that Minn. Rule 7850.4400 applies to NextEra’s proposed power plant. NextEra admits in its Application that it is proposing a “large electric power generating plant” because the proposed plant will generate in excess of 50 megawatts of electricity. NextEra correctly concludes that, because its proposed project would have a net generating capacity of 62.26 megawatts, NextEra “would be limited to the use of 31.125 acres of prime farmland for the Project site.”² NextEra then concedes that its proposed project would remove 290 acres of prime farmland, which is over nine times the amount allowed by statute.³

¹ (italics added, bold in original)

² Application pg. 50.

³ Application pg. 50.

While never addressing the magnitude by which its proposed project exceeds the statutory limit, NextEra argues that its Application should be approved for two reasons. First, NextEra contends that there is “no feasible and prudent alternative,” but NextEra neglects to discuss any actual alternatives. Second, NextEra asks MPUC to ignore the mandatory rule by “waiv[ing] its application...for good cause shown,” but NextEra fails to provide any authority upon which it claims MPUC can ignore the Rule.

Contrary to NextEra’s suggestion, MPUC is not empowered to “waive” the application of Minn. Rule 7850.4400 based on “good cause.” The Rule, by its express terms, is mandatory and prohibits MPUC from approving any project that removes acres of prime farmland in excess of the defined maximum amount, which NextEra admits its project does. The Rule further provides that an exception can only be granted where the developer can prove that “there is no feasible and prudent alternative.” Thus, waivers are not available for “good cause shown.”

NextEra also requests that “the Commission make an affirmative finding that there is no feasible and prudent alternative as required by Minn. Rule 7850.4400.”⁴ But while NextEra acknowledges it has an obligation to prove that “no feasible and prudent alternative” exists, it never makes an effort to meet its burden, instead relying on broad generalizations about metro real estate prices, suggestions that it may cost NextEra more to place the power plant in another location, and a misunderstanding of the impact that years of non-use will have on farmland.

Despite having a duty to prove that “no feasible and prudent alternative exists,” NextEra apparently never considered any alternatives. Likely recognizing that this failure is catastrophic to its Application, NextEra creatively opted to file this application under the “alternative process” provided for in Minn. Rule 7850.2900, which process is explained in Minn. Rule 7850.3100. NextEra correctly notes in its Application that Minn. Rule 7850.3100 provides: “The applicant shall include in the application the same information required by part 7859.1900, except the applicant need not *propose* any alternative sites or routes to the preferred site or route.”⁵ (emphasis added). But NextEra notably omits the next sentence of this rule, which provides: “If the applicant has rejected alternative sites or routes, the applicant *shall* include in the application the identity of the rejected sites or routes and an explanation of the reasons for rejecting them.” (emphasis added). This means that while NextEra claims in its application that there is “no feasible and prudent alternative” to its proposal, it apparently never considered and rejected any alternatives. Having failed to do so, NextEra cannot now claim that no “feasible and prudent alternative” exists.

⁴ Application pg. 53.

⁵ Application pg. vii

And NextEra and MPUC know that “feasible and prudent alternatives” exist because Xcel Energy (d/b/a Northern States Power) told MPUC as much in its March 24, 2014 Petition, in which Xcel sought approval of three power plant agreements, including its agreement with NextEra for the plant at issue here.⁶ Xcel explained in its Petition that, in response to a recently enacted law requiring Xcel to serve 1.5 % of its retail customers with solar energy by the end of 2030, Xcel initiated an RFP. Xcel explained that “[t]here was ample response to the RFP; we received over 100 proposals [Xcel received 111 proposals] for over 2,100 MW of solar photovoltaic generating capacity from 36 developers.”⁷ Xcel described the RFP response as “robust” and explained that it whittled the 111 proposals down to 15, “each with a leveled energy cost of \$85/MWh or less.”⁸ Moreover, MPUC has reviewed other solar plant construction applications that do not run afoul of the “prime farmland” Rule. In September 2014, for example, MPUC reviewed Aurora Distributed Solar, LLC’s proposal.⁹ Thus, there is no reasonable dispute that feasible and prudent alternatives exist.

Hoping to distract from the fact that it cannot show that “no feasible and prudent alternative” exists, NextEra concentrates on an assortment of facts that have no relevance to MPUC’s evaluation. NextEra states, for example, that it “found that solar facilities similar in *scope and scale* to the Project will, in *many circumstances*, impact prime farmland.”¹⁰ But this claim is both irrelevant and lacks factual support. First, by noting that solar facilities impact prime farmland “in many circumstances,” NextEra is implicitly acknowledging what is undisputed: there are circumstances where solar facilities similar in size and scope to NextEra’s proposed facility do not impact prime farmland. In other words, there are “feasible and prudent alternatives.” Xcel’s Petition and Aurora’s application confirm this fact. Second, there is no requirement that solar facilities must be similar in “scope and size” to NextEra’s proposal. So even if NextEra could show that no one could build a project similar in scope and size to its proposal without impacting prime farmland, that would only mean that MPUC should consider alternative projects with different scopes and sizes.

Further confusing the issues, NextEra alleges that “[p]otential sites closer to municipalities or major metropolitan areas (where there may be less prime farmland present) are generally more

⁶ Petition Docket No. E002/M-14-162.

⁷ Petition pg. 1

⁸ Petition pg. 13

⁹ In the Matter of Aurora Distributed Solar, LLC’s Application for a Site Permit to Construct a 100 MW Distributed Solar Energy Project, Docket No. E-6929/GS-14-515, 2014 WL 4794209. A copy of this application is attached.

¹⁰ Application pg. 50 (emphasis added)

expensive on a per-acre basis, generally force a developer to compromise on other site characteristics, and tend to be located in more densely populated areas that may not be appropriate for energy infrastructure development.”¹¹ These are nothing more than broad generalizations that are irrelevant to whether a “feasible and prudent alternative” exists. And even if this were relevant, the reason NextEra equivocates with words like “generally,” “tend to be,” and “may” is because it knows from the Xcel Petition that many proposed projects are closer to the Twin Cities. In fact, one of the three power purchase agreements that Xcel requested MPUC approve was for a 100 megawatt solar power plant near North Branch, Minnesota, which is approximately 45 miles north of Minneapolis.

NextEra then summarily concludes: “Considering the land requirements for large solar energy facilities and the economic viability of sites that do not impact prime farmland, the most prudent and feasible means of achieving the legislative mandate for solar energy likely requires the use of prime farmland in excess of the standard set in Minn. Rule 7850.4400.”¹² Here again, NextEra uses the word “likely” because it knows proposals exist that do not violate Minn. Rule 7850.4400. But NextEra hopes that MPUC will confuse the standard and allow NextEra to exceed the prime farmland limitations by more than *nine times* the limit. The standard is not what is most feasible or prudent or what is cheapest and most convenient for the developer. If that were the standard, the prime farmland limitation would have no meaning – every developer could eviscerate the prime farmland restrictions by merely claiming that its project advances the developer’s “economic viability,” as NextEra claims here.

Additionally, NextEra’s claim that meeting the legislative mandate likely requires the use of prime farmland is another broad, unsupported generalization. NextEra does not present any actual studies or financial information, nor does it discuss even one alternative. A significant percentage of this state is not prime farmland, and potential sites are everywhere.

NextEra proceeds to detail an assortment of facts that have nothing to do with the exception at issue, but gets its facts wrong. NextEra states that “the soil’s organic content and fertility may be greatly increased.”¹³ and the land will “rest,” without any authority supporting its claims. Several of the Objecting Families are farmers and have worked the land for generations. They will testify at the hearing that NextEra’s position is wrong. In the absence of proper agricultural management, farmland yield deteriorates. As a general rule, for each year that farmland is not properly managed, the land requires one year to return to its previous yield. NextEra’s position

¹¹ Application Pg. 52 (emphasis added)

¹² Application Pg. 52 (emphasis added)

¹³ Application pg. 53

that taking prime farmland out of production is somehow good for the land is both irrelevant and factually inaccurate.

NextEra also claims, again without factual support, that “[t]he applicability of the prime farmland exclusion to large solar facilities was likely unanticipated...” This not only has no bearing on the issue before MPUC, but NextEra neglects to present any evidence of what the legislature did and did not anticipate. But we know one thing the legislature considered – it wanted to preserve the limited resource of prime farmland.

Finally, NextEra makes a number of non-binding promises, each of which is unrelated to whether a “feasible and prudent alternative” exists, and these promises fail to describe in detail exactly what NextEra is guaranteeing it will do. NextEra says it “intends to take steps to minimize any impact to the existing drain tile system;”¹⁴ “native soil will be retained to the extent possible;”¹⁵ and that it “will continue to coordinate with the Minnesota Department of Agriculture to develop an appropriate Agricultural Impact Mitigation Plan.”¹⁶ These vague and legally unenforceable statements are irrelevant to the application of Minn. Rule 7850.4400.

NextEra’s Petition seeks to create the impression that its proposed project will have limited impact on Minnesota residents because it will be located in out-state Minnesota. The people living in the area disagree. Even though Marshall and the surrounding area has a small population relative to Twin Cities, over 500 people have already signed a petition opposing NextEra’s proposed project, with many specifically basing their objections on the waste of prime farmland.¹⁷ Many of these objectors realize what our legislature has also prioritized: Prime farmland is a natural resource critical to this state.

The Objecting Families request that MPUC reject NextEra’s Application because it violates the mandatory terms contained in Minn. Rule 7850.4400. At most, NextEra may be able to show that this project is best for its financial well-being, but the Rule makes it clear that “[e]conomic considerations alone do not justify the use of more prime farmland.” Alternatively, in the event MPUC believes that NextEra has satisfied Minn. Rule 7850.4400, the Objecting Families request that the Commission appoint an advisory test force to determine whether a “feasible and prudent alternative” exists.

¹⁴ Application pg. 54

¹⁵ Application pg. 54

¹⁶ Application pg. 54

¹⁷ A copy of this petition is attached.

State of Minnesota Public Utilities Commission

March 20, 2015

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Very truly yours,

HENSON & EFRON, P.A.

A handwritten signature in black ink, appearing to be 'Court J. Anderson', written over the firm name.

Court J. Anderson

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CJA:jmm:540116.DOCX

Enclosures

Marshall Solar L.L.C. Public Comments

4/24/15 4/27/15

In respect to the above project, we offer the following thoughts and comments:

The families in this area have already been subjected to the CapX 2020 project surrounding their residences with high voltage power lines. How much more are they supposed to be subjected to?

The project has many unanswered questions about health. There is not current information about living near a power plant of this size. How about the fact that there is high voltage power lines also nearby?

We want to hear about current studies about not only solar plants of this size with residents as close as a few hundred feet but also in conjunction with high voltage power. Could this area produce a cancer cluster? Who wants to remain here to find out?

We would like to see photo simulations of the substation that will be built.

Would like a full explanation of the solar panels – what are they made of. What is the lifespan? What happens when they are damaged? What pollutants do they contain?

How are the connectors ran from one to the other?

How many lines will be ran to connect to the substation?

What is the risk of fire?

Wind speed – what studies have been done in regards to the top speeds the panels can resist.

The inverters are shown to be a source of concerns. What current studies will be produced?

What studies have been done in regards to wells and aquifers? The city of Marshall gets water from the Dudley aquifer. Need to see current studies having to do with water pollutant issues. What protections are in place?

Finally, in regards to the placement of this project on Prime farmland, not only is the developer placing this project on very good prime land – they are asking that the law that the state has to pretty much be disregarded. Alternative sites need to be considered that will be less detrimental to not only the close neighbors but also in respect to the land taken out of production. Farmland does not “rest” as they state. Land needs to be cared for, nutrients need to given. There is a very good possibility this land once it has so-called “rested” will no longer be able to produce for many, many years past when these panels have or if they ever are removed.

Farmland in Minnesota is valuable natural resource. Our President stated in his state of the union address that we need to protect our rich producing land. Secretary of Agriculture, Tom Vilsack stated at the 2014 Agricultural Outlook Forum in short “Every farmer, every rancher worth their salt understands and appreciates that notion, and they convey that value system to their children and their grandchildren and their nieces and nephews, that that land is valuable to us. That land gives to us, and we must give back to it. And as young people grow up with that value system surrounding them, they learn that anything of value must be invested in.”

Our family is passionate in the protection of farmland. Not only is it an investment we hold close to our heart but we are passing that land to our generations to come. An industrial size solar plant is not appropriate or right to be placed on this land. It is the responsibility of Nextera to research more feasible and prudent sites to place this plant on. We along with renewable energy companies take the protection of our environment very seriously. We do believe in renewable energy.

Many questions such as the above are now placed on the shoulders of the Department of Commerce to answer during this period of the environmental assessment of this 500 acre solar power plant. We trust that in the end, they will find that much more research needs to be done before the site permit is given for this project. Please consider alternative sites that are more appropriate and deny the permit as put forth by Nextera.

Thank you-

Ron & Donna Weidauer

Marshall, MN

Property owners next to the proposed site.

In regards to Marshall Solar L.L.C. project GS 14-1052

Soil is our greatest asset in this part of the state, we are the stewards. We care for it and pass it on to the next generation in better shape than when we received it.

Look at the picture of the designed solar plant. The red dots are the intended inverter boxes. They will ruin the land forever. Under these they will need to replace the black dirt with sand or gravel to put the concrete down for the pads for the inverters. They must dig the electrical transmission system, which will also disturb the soil. We are being told that native grasses will be planted under the panels. Nothing will be able to grow under the panels as they will produce too much shade. After nothing is growing, who will the neighbors have to go to? Will NextEra then just say they tried to grow something?

How is water run off going to be handled? No mention of that in their application.

What guarantees are in place to not change the layout of the current plant and not bring these panels right up to the Geurts', Mullers and Burners?

The land next to the solar plant and the building sites will lose approximately 40% or more of their value. What compensation/protections are being presented by NextEra to protect property values?

The real estate taxes will not go down. This land should remain the same as what it has been used for since the first furrow was turned and remain for the purpose of food production.

What research has been done about daytime temperatures around the panels? These panels are made of glass. We need to have research done with the current data.

Production from this land has had more people employed yearly and will in the end pay more taxes than this solar plant ever will.

Solar power has its place, but there are better locations this should go and that should be where it doesn't involve peoples' lives and taking good farmable prime land out of production. This project is unbelievable to us! This is not being good stewards of the land and we ask the commission to uphold the rule in place and protect the natural resource of prime farmland and look for alternative sites.

Retired farmers,
Ron and Donna Weidauer